

No.

**CR - 08 00144 JW**

**FILED  
RS**

**MAR - 6 2008**

**CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

***SAN JOSE DIVISION***

**SEALED BY ORDER  
OF COURT**

**THE UNITED STATES OF AMERICA**

**vs.**

**RAMON SCRUGGS, ALLAN DANTO and  
HEIDI MACPHERSON a/k/a Heidi Lyn Pfeiffer**

**INDICTMENT**

**COUNT ONE:**

18 U.S.C. § 371 - Conspiracy To Commit Offenses  
Against the United States

**COUNTS TWO-FIVE:**

21 U.S.C. § 841(a)(1) - Distribution of Anabolic  
Steroids

**COUNTS SIX-NINE:**

21 U.S.C. §§ 331(k) and 333(b) - Doing Of Any Act  
Which Causes A Drug To Be Misbranded While  
Held For Sale With Intent To Defraud And Mislead

**COUNT TEN:**

18 U.S.C. § 1956(h) - Conspiracy To Commit  
Money Laundering

**COUNT ELEVEN:**

18 U.S.C. § 1956(a)(2)(A) - Money Laundering

10  
AKA  
JW

DOCUMENT NO. 1	CSA's INITIALS
DISTRICT COURT CRIMINAL CASE PROCESSING	

JOSEPH P. RUSSONIELLO (CSBN 44332)  
United States Attorney

FILED

MAR - 6 2008

SEALED BY ORDER  
OF COURT

CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

RS

CR - 08 00144 JW

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAMON SCRUGGS,  
ALLAN DANTO, and  
HEIDI MACPHERSON,  
a/k/a Heidi Lyn Pfeiffer,

Defendants.

VIOLATIONS: 18 U.S.C. § 371-Conspiracy  
To Commit Offenses Against the United  
States; 21 U.S.C. § 841(a)(1)-Distribution Of  
Anabolic Steroids; 21 U.S.C. §§ 331(k) and  
333(b)-Doing Of Any Act Which Causes A  
Drug To Be Misbranded While Held For Sale  
With Intent To Defraud And Mislead; 18  
U.S.C. § 1956(h) - Conspiracy To Launder  
Monetary Instruments; 18 U.S.C. §  
1956(a)(2)(A)--Money Laundering; 18  
U.S.C. § 2-Aiding & Abetting.

SAN JOSE VENUE

INDICTMENT

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

1. The New Hope Health Center was a medical facility located in Costa Mesa, California, whose primary business was the dispensation of anabolic steroids, human growth hormone, and other performance-enhancing drugs.

2. Defendant Ramon Scruggs ("Scruggs") was a physician who operated his medical

INDICTMENT

1 practice at New Hope Health Center. Under the name of New Hope Health Center, Scruggs and  
2 others conspired to distribute anabolic steroids, human growth hormone, and various other  
3 prescription drugs to professional baseball players, law enforcement personnel, and other  
4 individuals, in a manner outside the usual course of professional practice, and not for a legitimate  
5 purpose, but for non-legitimate purposes, including performance enhancement, aesthetic body  
6 improvement, and other non-medical reasons.

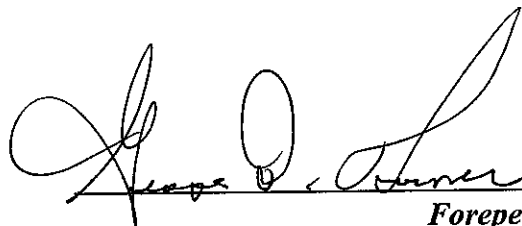
7 3. The non-legitimate prescriptions written by Scruggs at times were forwarded to  
8 pharmacies inside and outside the state of California, including Signature Pharmacy, in Orlando,  
9 Florida, and the drugs were subsequently delivered from the pharmacies to Scruggs's clients  
10 throughout the United States. At other times the drugs, including syringes that were pre-loaded  
11 with anabolic steroids, were sent directly from the New Hope Health Center to Scruggs's clients.

12 4. Defendant Allan Danto ("Danto") was a consultant at New Hope Health Center. In his  
13 role as consultant, Danto aided Scruggs in the distribution of human growth hormone for non-  
14 legitimate purposes, and assisted Scruggs in the smuggling of human growth hormone into the  
15 United States from the People's Republic of China ("PRC").

16 5. Defendant Heidi MacPherson, a/k/a Heidi Lyn Pfeiffer, ("MacPherson") was an office  
17 manager at New Hope Health Center. MacPherson aided Scruggs in the distribution of human  
18 growth hormone for non-legitimate purposes, and assisted Scruggs in the smuggling of human  
19 growth hormone into the United States from the PRC.

20 6. Under the Federal Food, Drug, and Cosmetic Act (FDCA), drugs were defined as,  
21 among other things, articles intended for use in the cure, mitigation, treatment or prevention of  
22 disease in man (21 U.S.C. §321(g)(1)(B)); articles (other than food) intended to affect the  
23 structure or function of the body of man (21 U.S.C. §321(g)(1)(C)); or articles intended for use as  
24 components other drugs (21 U.S.C. § 321(g)(1)(D)). A drug intended for use in man which,  
25 because of its toxicity, or other potentiality for harmful effect, or the method of its use, or the  
26 collateral measures necessary to its use, was not safe for use except under the supervision of  
27 a practitioner licensed by law to administer such drug; or a drug which was limited by an approved  
28 application under 21 U.S.C. § 355 to use under the professional supervision of a practitioner

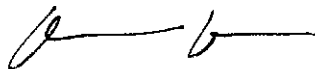
*A true bill.*



*Foreperson*

*Filed in open court this 5<sup>th</sup> day of March*

*A.D. 2008*



*United States Magistrate Judge*

*Bail. \$ No process*

1 licensed by law to administer such drug, could only be dispensed by a practitioner licensed by law  
 2 pursuant to a lawful prescription. 21 U.S.C. § 353(b)(1). These drugs were commonly known as  
 3 "prescription drugs."

4 7. A drug was misbranded if, among other things, the drug was a prescription drug  
 5 dispensed without a lawful prescription (21 U.S.C. § 353(b)(1)).

6 8. The term "human growth hormone" meant somatrem, somatropin, or an analogue of  
 7 either somatrem or somatropin. 21 U.S.C. § 333(e)(4). Somatropin was a synthetic or naturally  
 8 occurring growth hormone from the human pituitary gland. Somatrem was an analog of  
 9 somatropin containing an additional (methionyl) amino-acid residue.

10 9. The term "anabolic steroid" meant any drug or hormonal substance, chemically and  
 11 pharmacologically related to testosterone (other than estrogens, progestins, and corticosteroids)  
 12 that promoted muscle growth, and included testosterone and nandrolone and their analogues. 21  
 13 U.S.C. § 802(41)(A).

14 The Grand Jury charges:

15 COUNT ONE: (18 U.S.C. § 371) (Conspiracy To Commit Offenses Against The United States)

16 10. Paragraphs One Through Nine are hereby realleged and incorporated by reference  
 17 as if set forth in full herein.

18 CONSPIRACY TO COMMIT OFFENSES AGAINST THE UNITED STATES

19 11. On or about and between September 1, 2000, and May 14, 2003, in the Northern  
 20 District of California, and elsewhere, the defendants,

21 RAMON SCRUGGS,  
 22 ALLAN DANTO, and  
 23 HEIDI MACPHERSON,  
 a/k/a Heidi Lyn Pfeiffer,

24 and others, known and unknown to the grand jury, did intentionally conspire to commit offenses  
 against the United States, that is the defendants conspired to:

25 i. distribute anabolic steroids, a Schedule III controlled substance, in violation of  
 26 21 U.S.C. § 841(a)(1);

27 ii. smuggle human growth hormone into the United States, with the intent to  
 28 defraud and in a manner contrary to law, in violation of 18 U.S.C. § 545;

1           iii. misbrand a drug while it was held for sale, after its shipment in interstate  
2 commerce, with the intent to defraud and mislead in violation of Title 21, United States  
3 Code, Sections 331(k), and 333(b).

4                           MANNER AND MEANS OF THE CONSPIRACY

5           12. It was part of the conspiracy that defendants Scruggs, Danto, and MacPherson  
6 distributed to professional baseball players, law enforcement officers, and others anabolic  
7 steroids, specifically nandrolone, testosterone, stanozolol, human growth hormone, and other  
8 performance-enhancing drugs without a valid prescription based on a medically adequate  
9 examination.

10          13. It was further a part of the conspiracy that, on occasion, sports representation agents  
11 for professional baseball players referred their client-players to defendants Scruggs, Danto, and  
12 MacPherson for the purpose of obtaining anabolic steroids and other drugs which those  
13 individuals knew to be banned by Major League Baseball and therefore unavailable to the players  
14 through lawful medical channels absent the illegal prescriptions provided by Scruggs.

15          14. It was further a part of the conspiracy that defendants Scruggs, Danto and  
16 MacPherson communicated, by email and other means, with suppliers of human growth hormone  
17 in the PRC to negotiate the price, appearance, quantity, and shipping method of human growth  
18 hormone that the suppliers would ship to customers at the direction of defendants Scruggs, Danto,  
19 and MacPherson.

20          15. It was further a part of the conspiracy that defendant Scruggs issued prescriptions that  
21 were sent by defendants Scruggs and MacPherson to suppliers in the PRC for shipment of the  
22 human growth hormone to customers.

23          16. It was further a part of the conspiracy that the prescriptions issued by defendant  
24 Scruggs for human growth hormone were invalid prescriptions, in that they were not based upon  
25 any legitimate medical diagnosis of need for human growth hormone, and often occurred without  
26 Scruggs having conducted any medical examination of the customers.

27          17. It was further part of the conspiracy that defendant Danto conducted international  
28 wire transfers to pay for the human growth hormone smuggled from the PRC into the United

1 States.

2 18. It was further part of the conspiracy that the PRC-based suppliers of the human  
3 growth hormone communicated the International Express Airmail tracking numbers to defendants  
4 Scruggs and MacPherson so that they could track receipt of the shipments containing the human  
5 growth hormone.

6 19. It was further part of the conspiracy that in the event the FDA discovered and refused  
7 to admit shipments of the PRC-manufactured human growth hormone into the United States,  
8 defendants Scruggs and MacPherson negotiated new and replacement shipments of human growth  
9 hormone, and defendant Danto conducted the wire transfer to pay the PRC-based suppliers of the  
10 human growth hormone for new and replacement shipments.

11 ACTS UNDERTAKEN IN FURTHERANCE OF THE CONSPIRACY

12 20. It was part of the conspiracy that the defendants Scruggs, Danto, and MacPherson  
13 would and did commit the following overt acts in the Northern District of California, and  
14 elsewhere:

15 a. On or about January 13, 2003, defendants Scruggs, Danto, and MacPherson  
16 attempted to smuggle seven parcels containing human growth hormone sent from the PRC  
17 into the United States through the San Francisco Air Mail Facility in San Francisco,  
18 California.

19 b. On or about January 15, 2003, defendants Scruggs, Danto, and MacPherson  
20 attempted to smuggle a parcel containing human growth hormone sent from the PRC into the  
21 United States through the San Francisco Air Mail Facility in San Francisco, California.

22 c. On or about January 21, 2003, defendants Scruggs, Danto, and MacPherson  
23 attempted to smuggle a parcel containing human growth hormone sent from the PRC into the  
24 United States through the San Francisco Air Mail Facility in San Francisco, California.

25 d. On or about March 11, 2003, defendant Danto transferred \$3,605.07 from Bank  
26 of America account 02020-01935, located in San Francisco, California, to Zhan Li, Bank of  
27 China account number 001800140200032506, located in the PRC.

28 e. On or about March 17, 2003, defendant Scruggs distributed the anabolic steroid



1 testosterone to a person in Napa County.

2 f. On or about April 23, 2003, defendant Scruggs distributed the anabolic steroid  
3 testosterone to a person in Santa Clara County.

4 g. On or about May 7, 2003, defendant Scruggs, distributed the anabolic steroid  
5 testosterone to a person in Napa County.

6 h. On or about May 17, 2003, defendant Scruggs distributed the anabolic steroid  
7 testosterone to a person in Santa Clara County.

8 All in violation of Title 18, United States Code, Section 371.

9 COUNT TWO: (21 U.S.C. § 841(a)(1)--Distribution Of Anabolic Steroids)

10 21. On or about March 17, 2003, in Napa County, in the Northern District of California,  
11 and elsewhere, the defendant

12 RAMON SCRUGGS

13 did knowingly and intentionally distribute a Schedule III controlled substance, to wit: the anabolic  
14 steroid testosterone, outside the scope of professional practice and not for a legitimate medical  
15 purpose, in violation of Title 21, United States Code, Section 841(a)(1).

16 COUNT THREE: (21 U.S.C. § 841(a)(1)--Distribution Of Anabolic Steroids)

17 22. On or about April 23, 2003, in Santa Clara County, in the Northern District of  
18 California, and elsewhere, the defendant

19 RAMON SCRUGGS

20 did knowingly and intentionally distribute a Schedule III controlled substance, to wit: the anabolic  
21 steroid testosterone, outside the scope of professional practice and not for a legitimate medical  
22 purpose, in violation of Title 21, United States Code, Section 841(a)(1).

23 COUNT FOUR: (21 U.S.C. § 841(a)(1)--Distribution Of Anabolic Steroids)

24 23. On or about May 7, 2003, in Napa County, in the Northern District of California, and  
25 elsewhere, the defendant

26 RAMON SCRUGGS

27 did knowingly and intentionally distribute a Schedule III controlled substance, to wit: the anabolic  
28 steroid testosterone, outside the scope of professional practice and not for a legitimate medical



purpose, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE: (21 U.S.C. § 841(a)(1)—Distribution Of Anabolic Steroids)

24. On or about May 14, 2003, in Santa Clara County, in the Northern District of California, and elsewhere, the defendant

RAMON SCRUGGS

did knowingly and intentionally distribute a Schedule III controlled substance, to wit: the anabolic steroid testosterone, outside the scope of professional practice and not for a legitimate medical purpose, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIX: (21 U.S.C. §§ 331(k) and 333(b)—Doing Of Any Act Which Causes A Drug To Be Misbranded While Held For Sale With Intent To Defraud And Mislead)

25. On or about March 17, 2003, in Napa County, in the Northern District of California, and elsewhere, the defendant

RAMON SCRUGGS

did, with the intent to defraud and mislead, dispense the prescription drug and Schedule III controlled substance, to wit: the anabolic steroid testosterone, without a valid prescription based on a medically adequate examination, an act which, pursuant to 21 U.S.C. § 353(b)(1), resulted in that drug being misbranded while held for sale after shipment in interstate commerce;

All in violation of Title 21, United States Code, Sections 331(k) and 333(b).

COUNT SEVEN: (21 U.S.C. §§ 331(k) and 333(b)—Doing Of Any Act Which Causes A Drug To Be Misbranded While Held For Sale With Intent To Defraud And Mislead)

26. On or about April 23, 2003, in Santa Clara County, in the Northern District of California, and elsewhere, the defendant

RAMON SCRUGGS

did, with the intent to defraud and mislead, dispense the prescription drug and Schedule III controlled substance, to wit: the anabolic steroid testosterone, without a valid prescription based on a medically adequate examination, an act which, pursuant to 21 U.S.C. § 353(b)(1), resulted in that drug being misbranded while held for sale after shipment in interstate commerce;

All in violation of Title 21, United States Code, Sections 331(k) and 333(b).

1 COUNT EIGHT: (21 U.S.C. §§ 331(k) and 333(b)–Doing Of Any Act Which Causes A Drug To  
 2 Be Misbranded While Held For Sale With Intent To Defraud And Mislead)

3 27. On or about May 7, 2003, in Napa County, in the Northern District of California, and  
 4 elsewhere, the defendant

RAMON SCRUGGS

5  
 6 did, with the intent to defraud and mislead, dispense the prescription drug and Schedule III  
 7 controlled substance, to wit: the anabolic steroid testosterone, without a valid prescription based  
 8 on a medically adequate examination, an act which, pursuant to 21 U.S.C. § 353(b)(1), resulted in  
 9 that drug being misbranded while held for sale after shipment in interstate commerce;

10 All in violation of Title 21, United States Code, Sections 331(k) and 333(b).

11 COUNT NINE: (21 U.S.C. §§ 331(k) and 333(b)–Doing Of Any Act Which Causes A Drug To  
 12 Be Misbranded While Held For Sale With Intent To Defraud And Mislead)

13 28. On or about May 14, 2003, in Santa Clara County, in the Northern District of  
 14 California, and elsewhere, the defendant

RAMON SCRUGGS

15  
 16 did, with the intent to defraud and mislead, dispense the prescription drug and Schedule III  
 17 controlled substance, to wit: the anabolic steroid testosterone, without a valid prescription based  
 18 on a medically adequate examination, an act which, pursuant to 21 U.S.C. § 353(b)(1), resulted in  
 19 that drug being misbranded while held for sale after shipment in interstate commerce;

20 All in violation of Title 21, United States Code, Sections 331(k) and 333(b).

21 COUNT TEN: (18 U.S.C. § 1956(h))–Conspiracy To Commit Money Laundering)

22 29. The factual allegations contained in paragraphs One through Nine and Counts One  
 23 and Six through Nine of this Indictment are realleged and incorporated herein.

24 30. From on or about August 15, 2002, through on or about March 11, 2003, both dates  
 25 being approximate and inclusive, in the Northern District of California, the defendants

26 RAMON SCRUGGS,  
 27 ALLAN DANTO, and  
 28 HEIDI MACPHERSON  
 a/k/a Heidi Lyn Pfeiffer,

and others, known and unknown to the grand jury, did knowingly conspire to transfer funds affecting foreign commerce from a place in the United States, that is, San Francisco, California, to a place outside the United States, that is, the PRC, with the intent to promote the carrying on of specific unlawful activity, that is, the smuggling of human growth hormone into the United States from the PRC, in violation of Title 18, United States Code, Section 545.

All in violation of Title 18, United States Code, Sections 1956(h) and 1956(a)(2)(A).

COUNT ELEVEN: (18 U.S.C. § 1956(a)(2)(A)—Money Laundering)

31. The factual allegations contained in paragraphs One through Nine and Counts One and Six through Nine of this Indictment are realleged and incorporated herein.

32. On or about March 11, 2003, in the Northern District of California, and elsewhere, the defendants,

RAMON SCRUGGS,  
ALLAN DANTO, and  
HEIDI MACPHERSON,  
a/k/a Heidi Lyn Pfeiffer,

each aiding and abetting the other, did knowingly and willfully transfer funds affecting foreign commerce, that is, a wire transfer of \$3,605 from Ramon Scruggs's bank account, Bank of America Account #02020-01935, from a place in the United States, that is, San Francisco, California, to a place outside the United States, that is, the PRC, with the intent to promote the carrying on of specific unlawful activity, that is, the smuggling of human growth hormone into the United States from the PRC, in violation of Title 18, United States Code, Section 545.

All in violation of United States Code, Section 1956(a)(2)(A) and 2.

DATED: 3/5/08

A TRUE BILL.

FOREPERSON

JOSEPH P. RUSSONIELLO  
United States Attorney

MATTHEW A. PARRELLA  
Chief, San Jose Branch

(Approved as to form: \_\_\_\_\_)

AUSA NEDROW

AO 257 (Rev. 6/78)

# DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING

## OFFENSE CHARGED

SEE ATTACHED SHEET

- ☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY:

SEE ATTACHED SHEET

## PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SPECIAL AGENT PENNY KORTE, DEA

- ☐ person is awaiting trial in another Federal or State Court, give name of court

- ☐ this person/proceeding is transferred from another district per (circle one) FRCP 20, 21 or 40. Show District

- ☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. Att'y ☐ Defense

- ☐ this prosecution relates to a pending case involving this same defendant

- ☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW  
DOCKET NO.

MAGISTRATE  
CASE NO.

Name and Office of Person  
Furnishing Information on  
THIS FORM

JOSEPH P. RUSSONIELLO

☒ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Att'y  
(if assigned)

JEFFREY D. NEDROW

Name of District Court, and/or Judge/Magistrate Location  
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

RAMON SCRUGGS

DISTRICT COURT NUMBER

CR - 08 00144JW

RS

## DEFENDANT

### IS NOT IN CUSTODY

- 1) ☒ Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges

- 2) ☐ Is a Fugitive

- 3) ☐ Is on Bail or Release from (show District)

### IS IN CUSTODY

- 4) ☐ On this charge

- 5) ☐ On another conviction

- 6) ☐ Awaiting trial on other charges

☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

Has detainer  
been filed?

☐ Yes  
☐ No

If "Yes"  
give date  
filed

DATE OF  
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

Month/Day/Year

DATE TRANSFERRED  
TO U.S. CUSTODY

☐ This report amends AO 257 previously submitted

## ADDITIONAL INFORMATION OR COMMENTS

### PROCESS:

☐ SUMMONS ☒ NO PROCESS\*

☐ WARRANT Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: \_\_\_\_\_

\*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_

Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

PENALTY SHEET FOR UNITED STATES V. RAMON SCRUGGS

**Count One** – Conspiracy To Commit Offenses Against the United States  
18 U.S.C. § 371  
(All Defendants)

Maximum Penalty:  
Five years imprisonment  
\$250,000 fine  
Maximum Three Years Supervised Release  
\$100 special assessment fee

**Counts Two through Five** – Distribution of Anabolic Steroids  
21 U.S.C. § 841(a)(1)  
(Defendant Scruggs only)

Maximum Penalty for each count:  
Five Years Imprisonment  
\$250,000 fine  
Maximum Two Years Supervised Release  
\$100 special assessment fee

**Counts Six through Nine** – Misbranded drugs held for sale with intent to defraud and mislead--21 U.S.C. § 331(k) and 333(b)  
(Defendant Scruggs only)

Maximum Penalty for each count:  
Maximum Three Years Imprisonment  
\$250,000 fine  
Maximum One Year Supervised Release  
\$100 special assessment fee

**Count Ten** – Conspiracy To Commit Money Laundering  
18 U.S.C. § 1956(h)  
(All defendants)

Maximum 20 years imprisonment  
\$500,000 fine  
Maximum Five Years Supervised Release  
\$100 special assessment fee

**Count Eleven** – Money Laundering  
18 U.S.C. § 1956(a)(2)(A)  
(All defendants)

Maximum 20 years imprisonment  
\$500,000 fine  
Maximum Five Years Supervised Release  
\$100 special assessment fee

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING**OFFENSE CHARGED**

SEE ATTACHED SHEET

☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY:

SEE ATTACHED SHEET

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

SPECIAL AGENT PENNY KORTE, DEA

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a pending case involving this same defendant☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underSHOW  
DOCKET NO.MAGISTRATE  
CASE NO.Name and Office of Person  
Furnishing Information on  
THIS FORM

JOSEPH P. RUSSONIELLO

☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y  
(if assigned)

JEFFREY D. NEDROW

Name of District Court, and/or Judge/Magistrate Location  
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

ALLAN DANTO

DISTRICT COURT NUMBER

CR - 08 00144W

RS

**DEFENDANT****IS NOT IN CUSTODY**1) ☒ Has not been arrested, pending outcome this proceeding.  
If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction6) ☐ Awaiting trial on other charges☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

Has detainer  
been filed?☐ Yes  
☐ NoIf "Yes"  
give date  
filedDATE OF  
ARREST

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED  
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS\*☐ WARRANT Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: \_\_\_\_\_

\*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_

Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

PENALTY SHEET FOR UNITED STATES V. RAMON SCRUGGS

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\$100 special assessment fee

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mislead--21 U.S.C. § 331(k) and 333(b)  
(Defendant Scruggs only)


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Maximum Three Years Imprisonment  
\$250,000 fine  
Maximum One Year Supervised Release  
\$100 special assessment fee

**Count Ten** – Conspiracy To Commit Money Laundering  
18 U.S.C. § 1956(h)  
(All defendants)

Maximum 20 years imprisonment  
\$500,000 fine  
Maximum Five Years Supervised Release  
\$100 special assessment fee

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18 U.S.C. § 1956(a)(2)(A)  
(All defendants)

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\$500,000 fine  
Maximum Five Years Supervised Release  
\$100 special assessment fee





AO 257 (Rev. 6/78)

# DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT ☐ SUPERSEDING

## OFFENSE CHARGED

SEE ATTACHED SHEET

☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY:

SEE ATTACHED SHEET

CR

DEFENDANT - U.S.

HEIDI MACPHERSON a/k/a Heidi Lyn Pfeiffer

DISTRICT COURT NUMBER

08 00144W

RS

## PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SPECIAL AGENT PENNY KORTE, DEA

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. Att'y ☐ Defense

☐ this prosecution relates to a pending case involving this same defendant

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW  
DOCKET NO.

MAGISTRATE  
CASE NO.

Name and Office of Person  
Furnishing Information on  
THIS FORM

JOSEPH P. RUSSONIELLO

☒ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Att'y  
(if assigned)

JEFFREY D. NEDROW

## IS NOT IN CUSTODY

1) ☒ Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges

2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release from (show District)

## IS IN CUSTODY

4) ☐ On this charge

5) ☐ On another conviction

6) ☐ Awaiting trial on other charges

☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

Has detainer  
been filed?

☐ Yes  
☐ No

If "Yes"  
give date  
filed

DATE OF  
ARREST

Month/Day/Year

Or... If Arresting Agency & Warrant were not

DATE TRANSFERRED  
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

## ADDITIONAL INFORMATION OR COMMENTS

### PROCESS:

☐ SUMMONS ☒ NO PROCESS\*

☐ WARRANT Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: \_\_\_\_\_

\*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_

Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

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PENALTY SHEET FOR UNITED STATES V. RAMON SCRUGGS

**Count One** – Conspiracy To Commit Offenses Against the United States  
18 U.S.C. § 371  
(All Defendants)

Maximum Penalty:  
Five years imprisonment  
\$250,000 fine  
Maximum Three Years Supervised Release  
\$100 special assessment fee

**Counts Two through Five** – Distribution of Anabolic Steroids  
21 U.S.C. § 841(a)(1)  
(Defendant Scruggs only)

Maximum Penalty for each count:  
Five Years Imprisonment  
\$250,000 fine  
Maximum Two Years Supervised Release  
\$100 special assessment fee

**Counts Six through Nine** – Misbranded drugs held for sale with intent to defraud and mislead--21 U.S.C. § 331(k) and 333(b)  
(Defendant Scruggs only)

Maximum Penalty for each count:  
Maximum Three Years Imprisonment  
\$250,000 fine  
Maximum One Year Supervised Release  
\$100 special assessment fee

**Count Ten** – Conspiracy To Commit Money Laundering  
18 U.S.C. § 1956(h)  
(All defendants)

Maximum 20 years imprisonment  
\$500,000 fine  
Maximum Five Years Supervised Release  
\$100 special assessment fee

**Count Eleven** – Money Laundering  
18 U.S.C. § 1956(a)(2)(A)  
(All defendants)

Maximum 20 years imprisonment  
\$500,000 fine  
Maximum Five Years Supervised Release  
\$100 special assessment fee

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